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USDA Forest Service
Objection Reviewing Officer
EMC, RPC-6th Floor
Attn: Judicial and Administration Reviews
1601 N. Kent St.
Arlington, VA 22209

**Objections to the Land Management Plan 2013 Final Environmental
Impact Statement and Draft Record of Decision. Sent via Email.**

**The responsible Official is Faye Krueger, Regional Forester of Northern
Region USDA Forest Service**

Please accept these comments on behalf of Save Our Cabinets and Rock
Creek Alliance.

Lead Objector-Rock Creek Alliance

Save Our Cabinets is a Montana nonprofit corporation. Our primary mission is to protect the 94,000-acre Cabinet Mountains Wilderness in northwestern Montana from activities incompatible with wilderness through public education and advocacy. We also work to protect the lands, waters, fisheries, wildlife, air and other environmental resources of the greater Cabinet Mountains ecosystem.

The Rock Creek Alliance is a non-profit organization headquartered in Sandpoint, ID with a field office in Trout Creek, MT. The Alliance strives to protect water quality, public lands, and wildlife resources from proposed hardrock mining activity in northern Idaho and western Montana, with a focus on the protection and preservation of the Clark Fork-Pend Oreille Watershed and the Cabinet Mountains Wilderness.

Both organizations submitted joint comments on the Draft Land Management Plan that was issued in 2012. The following are our objections to the Final Environmental Impact Statement (FEIS) and the Draft Record of Decision (DROD).

An Isolated population of grizzly bears

Protecting habitat adjacent to and in the region of the Cabinet Mountains Wilderness (CMW) is critical because grizzly bears do not cross Highway 2 from the Yaak into the Cabinet Mountains Wilderness Ecosystem. That fact isolates the estimated 10-12 bears that use the CMW, so protecting Inventoried Roadless Areas Cabinet Face East, Galena Creek, Allen Peak, and Barren Peak, and others within and around the CMW, is especially important. Unfortunately, the FEIS and DROD fail to adequately address the habitat needs of bears by designating most of the mentioned IRA's as MA5b.

*Further to the south, the U.S. Highway 2 corridor (in Montana) runs east-west across the CYE, and includes a major state highway, railroad, the Kootenai River, and private land development and roads. The corridor bisects the CYE between the Yaak and Cabinet Mountains portions. The Service has no information documenting movement of grizzly bears between the Yaak and Cabinet Mountains; grizzly bears in the Cabinets are likely isolated from the Yaak segment and the Selkirk grizzly bear population at this time (Proctor et al. 2004). **2006 Rock Creek Biological Opinion, page A-21***

Connectivity within the Cabinet Mountains Wilderness

The FEIS and subsequent DROD could do a better job of protecting and/or connecting the habitat of the very small population of grizzly bears that occupy the southeast portion of the CMW with the larger northwestern portion. The CMW as a whole is already isolated from the larger population of bears within the Yaak Ecosystem by Highway 2. The isolation of the

bears that occupy the much smaller southern section of the wilderness is already exacerbated because of the narrow section within the wilderness near Rock Lake and Ojibway Peak.

The US Forest Service and the US Fish and Wildlife Service have always recognized that bears are either reluctant or are unable to move from one portion of the wilderness to the other through that narrow neck. It is likely that the few bears that occupy the small southeastern portion of the CMW would be the first to be extirpated if measures are not taken within the forest plan to protect their habitat.

Two massive copper/silver mines (Rock Creek and Montanore) would further isolate the small grizzly population that occupies habitat within the southeastern portion of the CMW. Both of these proposed mines would operate nearly adjacent to that narrow neck that already restricts movement of the bears. The mines would involve large-scale human activity and generate considerable noise. The bears would likely avoid the region.

Solution: Set aside a portion of the 50,386 acre Cabinet Face East near the narrow portion within the CMW to help widen the travel corridor and to compensate for future mining impacts in the region.

Preservation and expansion of habitat

Isolation and loss of habitat for those few grizzlies that occupy the southeastern portion of the CMW needs to be remedied. The drafting of the Land Management Plan for the Kootenai National Forest was or is an opportunity to provide habitat for this threatened population.

While mining continues to be a threat to the bears, the loss of habitat and displacement by motorized recreation is also a significant problem. The small population of grizzly bears within the southeastern portion of the CMW needs more protected and secure habitat. The FEIS and DROD unfortunately classified almost all of available habitat in that specific region as MA5b (motorized). Galena Creek, Allen Peak, Barren Peak, and the southeast portion of Cabinet Face East were all designated as MA5b.

Inventoried Roadless Areas (IRAs) such as the southern portion of the Cabinet Face East, Barren Peak, Allen Peak, and Galena Creek all would have provided essential habitat for grizzly bears, but were instead opened to

motorized recreation. Our preference would be that these IRA's adjacent to the wilderness be protected as MA1b (recommended wilderness), but short of that, at least a portion of these IRA's should retain non-motorized quality as an MA5a.

The Land Management process needs to recognize the importance of these IRA's to grizzly bears. Mining will continue to disperse and displace the species outward from the Rock Creek Drainage to the east toward the Vermillion River and to the south toward the Clark Fork River. The FEIS and DROD should make some changes to protect additional habitat to the south and east of the CMW for the bears that are displaced that direction.

Solution: At a minimum the portion of the afore mentioned IRA's, Cabinet Face East, Barren Peak, Allen Peak, and Galena Creek directly adjacent to the CMW, should maintain their non-motorized quality by being classified as either MA1b (recommended wilderness) or MA5a (non-motorized). Protecting a portion of these IRA's adjacent to the CMW would not only expand habitat for bears, but also create a buffer from potential mining impacts.

Connectivity with other populations of grizzly bears is needed.

The small bear population within the southeastern portion of the CMW also needs better connectivity to the much larger Northern Continental Divide Ecosystem (NCDE) population. Portions of the Barren Peak, Allen Peak, and Galena Creek should have retained a MA5a classification to establish secure connectivity with the larger NCDE.

The recent Draft Northern Continental Divide Conservation Strategy for grizzly bears also failed to properly address how important a secure travel corridor to and from the NCDE is for the bears in the Cabinet Ecosystem. A secure travel corridor north of Highway 2 between the NCDE and the Yaak is important for the population within the Yaak, but if bears won't cross Highway 2, it does nothing for bears in the Cabinet Ecosystem. A travel corridor needs to be established south of Highway 2 and north of Highway 200. The FEIS is a critical first step in securing that connectivity with the population within the NCDE.

It is likely that without a secure connection with the NCDE or a significant expansion of habitat adjacent to the CMW, the bear population within the

wilderness will continue to decline. The problem is, as mentioned before, exacerbated because the bears do not cross Highway 2, and their movement is restricted by the narrow section of the wilderness.

It is critical that a secure protected travel corridor is established between the Mt. Silcox Area of the Lolo National Forest and the Cabinet Mountains Wilderness. One would assume that the Lolo National Forest would then find a way to secure habitat that creates an environment whereby bears could travel from the Mission Mountains to the Cube/Iron Mt. Silcox IRA.

Protecting the Cataract Canyon IRA and the Research Natural Area east of Vermillion Peak certainly helps in establishing that secure travel corridor south of Highway 2 and north of Highway 200. Unfortunately, once the bears cross the Vermillion River they would enter into areas designated for motorized use.

Portions of Galena Creek IRA and/or a combination of Allen Peak and Barren Peak IRA's need to be secured as either MA1b or MA5a so bears can move relatively freely between the NCDE and the Cabinet Mountains Wilderness.

In summary, the USFS should look again at the IRA's adjacent to the southeastern portion of the CMW and consider protecting portions to provide for more habitat security and travel corridors. At a minimum, portions of individual IRA's such as Galena Creek and Allen Peak can be protected as MA5a. Securing and protecting the land around places like the Cabinet Divide Trail (trail #360) in Galena Creek IRA would be critical.

Solution: The Forest needs to take another look at the potential for a travel corridor between the Cube Iron/Mt. Silcox region of the Lolo National Forest and the Cabinet Mountains Wilderness. With Cataract Canyon being designated as MA5a, simply classifying a portion of Galena Creek IRA and Allen Peak IRA would provide an opportunity for bear movement.

Rock Creek Trail # 935

The USFS should not motorize the lower section of the Rock Creek Trail. This area is very important grizzly bear habitat and motorizing it would contribute to the squeezing shut of that afore mentioned narrow travel corridor that separates the two portions of the CMW.

While it is appreciated that the FEIS is designating part of the Rock Creek Drainage as MA1b, allowing motorized use of the trail would likely render the Rock Creek IRA unusable for grizzly bears.

The USFS has also been very vague as to why the Rock Creek Trail is to become motorized. The local USFS office (Cabinet Ranger District) stated that the gate would likely remain closed. If so, why make the trail motorized? Is it for mining access? Is there the potential for yet another major mining operation in the Rock Creek Drainage, or was the change requested to accommodate the two proposed major mines in the area (Montanore and Rock Creek)?

Solution: Designate the entire Rock Creek Trail as MA5a.

Wilderness

While we fully endorse the MA1b classification for the proposed Scotchman Peaks Area, we feel that designation came at a price. The FEIS, DROD, and planning process ignored the needs, threats, and condition of the Cabinet Mountains Wilderness. The two massive mines proposed for the southern CMW and the struggling grizzly bear population should have been compelling reasons to have offered some protection for the IRA's adjacent to the southeastern portion of the CMW.

Clearly, protecting the Cabinet Mountains Wilderness and roadless areas for future wilderness designation are not a priority for the Kootenai National Forest. Otherwise, we would have seen a real effort to protect more of the IRAs in the region. The permitting of two massive mines beneath the wilderness, the lack of protection for the IRAs within the FEIS/DROD, and the motorizing of the Rock Creek Trail demonstrate that the Forest is listening to the mining industry and motorized interests to the exclusion of other users.

Conclusion

We have attempted to find alternatives to some of the decisions made in the FEIS and DROD. The grizzly bear population within the Kootenai National Forest continues to decline, yet the forest continues to refuse to protect adequate habitat. Augmentation of the bear population in the Cabinet/Yaak Ecosystem is not a long-term solution.

If bears are to survive and become a sustainable viable population secure habitat must be protected. This can be achieved in part by:

- Changing the decision pertaining to the Rock Creek Trail and classifying the entire trail as MA5a. The decision to motorize the trail contradicts concerns expressed by the USFWS regarding impacts of the proposed Rock Creek Mine on the grizzly bear population in the Rock Creek Drainage. The decision to motorize the trail also may complicate matters when cumulative impacts on grizzly bears from both the Rock Creek and proposed Montanore mine are determined.
- Taking another look at the IRA's adjacent to the southeastern portion of the CMW, and finding a way to protect all or portions of the Galena Creek, Allen Peak, and Barren Peak IRA's as either MA5a or MA1b to provide a secure travel corridor for grizzly bears and to serve as a buffer around the wilderness.
- Looking at the habitat requirements for the small grizzly bear population in the southeastern portion of the Cabinet Mountains Wilderness. The FEIS and DROD did not take into consideration the significant cumulative impacts the proposed Rock Creek and Montanore mines would have on the grizzly bear population.

Sincerely,



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